

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

GEORGE IVERSON, Individually,

Plaintiff,

v.

BRAINTREE PROPERTY
ASSOCIATES, LIMITED
PARTNERSHIP, a Massachusetts
Limited Partnership.

Defendant.

Civil Action #: 1:04-CV-12079 NG-JLA

PLAINTIFF'S AGREED MOTION FOR
EXTENSION OF TIME TO MOVE FOR ATTORNEY FEES

COMES NOW the Plaintiff, George Iverson, by and through his undersigned attorneys, and hereby moves this Court for an Extension of Time in which to file Plaintiff's Motion For Attorney Fees, Costs, Expert Fees and Litigation Expenses, and states as follows:

1. On September 18, 2006, the respective parties filed a Settlement Agreement under seal [DE 25].
2. By Order dated October 2, 2007, this Court Ordered Plaintiff's counsel to submit an application for attorneys fees by October 11, 2007.
3. The respective parties are negotiating with respect to the issue of attorney fees. Out of an abundance of caution, Plaintiff respectfully requests an eleven (11) day extension of time to file its motion for attorney fees to allow the parties additional time to negotiate.
4. Defendant is on notice that Plaintiff intends to file its motion for attorney fees,

costs, expert fees and litigation expenses incurred in this action and agrees to this requested extension of time.

Wherefore, Plaintiff respectfully requests an eleven (11) day extension of time in which to file his motion for attorney fees, costs, litigation expenses and expert fees.

Respectfully submitted,

FULLER, FULLER & ASSOCIATES, P.A.
Attorneys for Plaintiff

By: /s/John P. Fuller
John P. Fuller, Esq., *pro hac vice*
12000 Biscayne Boulevard, Suite 609
North Miami, FL 33181
jpf@fullerfuller.com
Tel.: (305) 891-5199
Fax: (305) 893-9505

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served electronically via the Court's CM/ECF System on October 8, 2007, to:

Jennifer Martin Foster, Esq.
Kay B. Lee, Esq.
Greenberg Traurig, LLP
One International Place
Boston, MA 02110
617-310-6000

and by email to:

Brian C. Blair, Esq.
Baker & Hostetler, LLP
200 South Orange Avenue #2300
Orlando, FL 32801
BBlair@BakerLaw.com

FULLER, FULLER & ASSOCIATES, P.A.

Attorneys for Plaintiff

12000 Biscayne Boulevard, Suite 609
North Miami, FL 33181

jpf@fullerfuller.com

Tel.: (305) 891-5199

Fax: (305) 893-9505

By: /s/ John P. Fuller

John P. Fuller, Esq., *pro hac vice*